

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re MetaZoo, LLC

No. 24-10874 (JPM)

MOTION BY PING LI FOR RELIEF FROM AUTOMATIC STAY

Ping Li, by and through undersigned counsel, respectfully represents the following:

1. A petition filed pursuant to Chapter 7 of the United States Bankruptcy Code was filed on behalf of the above captioned debtor, a limited liability company, on May 20, 2024. This petition listed Ping Li as a creditor of MetaZoo, LLC.
2. Ping Li is an individual and is the owner of a warehouse located at 3051 Corvin Dr, Santa Clara, CA, . This warehouse was indeed leased; the monthly rent was \$24,500.
3. However, the warehouse in question was not leased to MetaZoo LLC, but rather to an individual named Shaw James. Shaw James is not a petitioner to the above captioned matter, and likewise, MetaZoo LLC was not a party or a named beneficiary in the lease contract.
4. A limited liability company is a separate and distinct legal entity from any member of the company. *See, e.g.,* Cal. Corp. Code 17701.04(a). A leasing right or obligation does not pass between an LLC and a member without explicit agreement in writing to this effect. *See, e.g., Whittwood CA LLC v. Farmers & Merchants Bank*, 14 Cal. App. 5th 992 (Court of Appeals of California, Second District, 2017).

5. As such, movant Ping Li respectfully submits that the bankruptcy petition of MetaZoo LLC, a company not party to the lease or named as a beneficiary therein, does not create an automatic stay with regard to the lease in question, the only parties to whom were Ping Li and the individual Shaw James.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nate Strand", with a stylized flourish at the end.

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